

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

Case No. 1:23-_____

ANDREW TATE AND TRISTAN TATE,

Plaintiffs

vs.

EMMA GABBEY, MONA TABARA GABBEY,
WILLIAM GABBEY, ALIONA UNTILA,
AND MATTHIEU MARTELLY

Defendants.

_____ /

DEFENDANTS' DISCLOSURE STATEMENT (FRCP 7.1)

Pursuant to Rule 7.1, Fed. R. Civ. Pro, Defendants, through their attorneys, hereby state as follows:

1. As alleged in their Amended Complaint filed in State Court, the Plaintiffs Andrew and Tristan Tate reside in Romania. Upon information and belief, they are citizens of the United Kingdom and the United States.

2. Defendant, Emma Gabbey is a citizen of the United States and does not reside in Florida.

3. Defendants Mona and William Gabbey are citizens of the United States and reside in Florida.

4. Defendant, Aliona Untila, is a citizen of Moldova and Romania and does not reside in the United States or Romania.

5. Defendant, Matthieu Martelly, is citizen of the United States and resides in Florida.

Dated: August ___, 2023.

Respectfully submitted,

NATIONAL CENTER ON SEXUAL EXPLOITATION

/s/ Danielle Bianculli Pinter

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* Application for admission pro hac vice
pending

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by email

on August ___, 2023 on counsel for Plaintiffs in the state court action:

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